7/30/85

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POTOMAC ELECTRIC POWER COMPANY · 1900 PENNSYLVANIA AVENUE, N. W., WASHINGTON, D. C. 20068
(202) 872-2000

This is to certify that I have reviewed the "PEPCO PCB/Oil Spill Prevention Control and Countermeasure Plan for Superfund Cleanup at United Rigging Site" and I found it satisfactory. Therefore, I attest that this document has been prepared in accordance with good engineering practice as required in Code of Regulations 40 Section 112.3(d).

Washington, D. C., July 16, 1985
Richard M. Armstrong
Senior Project Engineer
Substation Construction and Maintenance

State of Maryland P.E. #9871

Richard M. Armstrong

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PEPCO PCB/OIL SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN FOR SUPERFUND CLEANUP AT UNITED RIGGING SITE

1.0 PURPOSE

1.1 To provide instruction for the safe handling of PCBs/oil, including PCB contaminated equipment and materials.

1.2 To ensure that the decontamination of PEPCO transformers located at the United Rigging site is conducted in a manner so as to minimize/eliminate the potential discharge of oil or PCBs to the environment.

1.3 To ensure compliance with the Federal Toxic Substances Control Act (TSCA), Superfund, Department of Transportation (DOT) regulations; and the State of Maryland Controlled Hazardous Substances (CHS) regulation.

1.4 To comply with the Administrative Consent Order #_____ of EPA, DHMH, PEPCO, and United Rigging.

2.0 SCOPE

2.1 This procedure is currently limited solely to the decontamination of PEPCO transformers containing PCBs/oil located at the United Rigging

site.

3.0 APPLICABILITY

3.1 This procedure applies to all PEPCO personnel or PEPCO contractors associated solely with the decontamination of transformers containing PCBs/oil.

4.0 RESPONSIBILITY

4.1 The PEPCO site Project Coordinator is responsible for ensuring that the appropriate personnel comply with this procedure.

5.0 FACILITY DESCRIPTION

The United Rigging and Hauling Company owns and operates a rigging and hauling business located at 6701 Ammendale Rd., Beltsville, Maryland, Prince Georges County, Maryland. The site consists of approximately ten acres and is bounded on all sides by industrial facilities. Stormwater run-off from the site enters two storm drains and travels via ditches to a local unnamed stream, a tributary of Indian Creek. As part of its operation, United Rigging stores and recovers metal from scrap electrical transformers, some of which contain various levels of water, oil, and/or

PCB contaminated oil. The majority of these transformers are stored in Area A as described by the attached work plan.

6.0 INSTRUCTIONS

6.1 Emergency Equipment Required:

(a) Solvents: kerosene, SS-25, and power cleaner

(b) Absorbents: sand, vermiculite, and sol-speedi dri

(c) Protective Clothing: aprons, rain suits, rubber boots, hard hats, non-porous gloves, and full-face respirator with organic fumes filter

(d) Containment Equipment: drip pans, 55 gallon drums, oil booms, sandbags, rags, and plastic bags.

6.2 General Safety Precautions:

(a) Wear appropriate protective clothing and eye wear to prevent contact with PCBs

(b) Avoid breathing vapor or fumes from PCBs

(c) Avoid contact with PCB liquids

(d) In case of skin contact with PCBs, wash with warm water and soap

(e) In case of skin or eye irritation, consult Company Medical Department or nearest Physician

(f) Wash with warm water and soap before eating, drinking, smoking, or using toilet facilities

(g) Report spills of any quantity to PEPCO site Project Coordinator and Environmental Affairs representative.

6.3 PCBs/Oil Handling and Storage:

(a) Conduct pre-work inspection to ensure that appropriate safety and containment equipment is at site and functioning.

(b) Ensure that all containment structures, including berms, booms, etc., have been appropriately deployed and maintained around the proposed work area in accordance with the project work plan.

(c) Wear protective clothing prior to handling PCBs. When protective clothing becomes contaminated, it must be wiped clean with a solvent. All cleanup materials must be placed in a plastic bag and discarded in the appropriately-labelled disposal drum.

(d) At the start and end of each workday, conduct visual inspections of PCBs/oil storage and handling areas to determine evidence of material spill/leaks. Evidence of these inspections should be logged daily using form in APPENDIX I. Ad hoc visual inspections of the work area should be conducted for evidence of any spill/leak.

(e) In the event of a spill, immediately notify the site Project Coordinator or his designee and attempt to stop the spill. The Project Coordinator will visit the site and determine the severity and extent of the spill and direct the appropriate cleanup response. All spills will be reported to OSC and the PEPCO Environmental Affairs representative. All cleanup materials must be placed in appropriately-labelled drums for temporary storage prior to disposal.

(f) The Environmental Affairs representative is responsible for all PEPCO reporting to State and Federal agencies of spills and waste disposal.

6.4 PCBs/Oil Transfer:

(a) Prior to pumping PCBs/oil from the waste oil tank to waste oil tanker, ensure all connections are properly secured. Place drip pans along the temporary line under pipeline connections and/or

valves.

(b) Start oil pumps and inspect the pipeline for system leaks. If no leak is observed, continue pumping.

(c) In the event of an oil leak, stop the pumps immediately and follow instruction 6.3(e).

6.5 PCBs/Oil Pre-Disposal Requirements:

(a) All PCBs/oil debris resulting from any site cleanup activity must be placed in a plastic bag and hand-loaded into drums. Make sure the outside and bottom of drums remain free of contaminated material. When drums are full, install metal top with locking ring.

(b) All drums containing contaminated material from cleanup must be appropriately marked, dated, and labelled and stored in an area in accordance with the site work plan. Decontaminated transformers must also be labelled and stored in non-contaminated areas for disposal consistent with the site work plan.

(c) PCB material greater than 500 ppm must be disposed of within 30 days from date of temporary storage. PCB material less than 500 ppm must be disposed of within 90 days of temporary storage.

(d) Contaminated waste oil/water pumped into the Maryland CHS certified waste oil tanker for disposal must be sampled for PCB concentration. CAUTION: In no case, must transformer oil tested and found to have PCB concentrations greater than 499 be pumped into the waste oil tanker.

(e) PCB contaminated oil must be transported and disposed of at Morgantown in accordance with the PCB/Oil Burning Procedure OP 118, Rev. 2.

6.6 Record-keeping:

(a) All spills occurring as a result of site cleanup activity must be documented in accordance with APPENDIX II. Copies of these reports must be forwarded to the site Project Coordinator.

(b) Drums with PCB contaminated material must be appropriately labelled and weighed prior to disposal. Records of weight must be logged in a book supplied by site Project Coordinator.

(c) All shipments of PCB material for disposal must be manifested in accordance with Appendix III. Copies of each manifest must be turned over to the site Project Coordinator.

(d) The Project Coordinator shall transmit copies of all spill, storage, and disposal records to the Water and Land Use

Department at the completion of this project for the preparation of PEPCO's annual PCB/RCRA reports.

7.0 TRAINING

7.1 All PEPCO personnel assigned to the United Rigging site cleanup must be previously trained in the safe handling and cleanup response of PCB and oil materials in accordance with existing Company procedures.

7.2 All PEPCO personnel involved in the transportation of oil or PCB materials must be previously certified by the Department of Health and Mental Hygiene and the Department of Natural Resources.

8.0 CONCLUSIONS

8.1 All cleanup and decontamination activities must be conducted in strict adherence to the site cleanup work plan.

8.2 Cleanup of PCBs/oil spills must be started promptly.

8.3 Record of oil spill events must be kept. Information on spills must be gathered and reported promptly.

8.4 Use good common sense in approaching and resolving problems.

Utilize all necessary facilities and equipment for prompt action.

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

APPROVALS

Title	Signature	Date
Manager, Water and Land Use	L. S. Guiland	7/17/85
Director, Environmental Affairs	W. A. Foy	7/17/85
Senior Project Engineer, Substation Construction and Maintenance	R. M. Armstrong	7/16/85
EPA On-the-Scene Coordinator	R. Caron	

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APPENDIX I

POTOMAC ELECTRIC POWER COMPANY
SPCC INSPECTION CHECKLIST

Date: _____ Time: _____ a.m. p.m.

Facility: _____

	Yes	No
OIL STORAGE AREAS		
Do storage tank(s), tanker, truck-associated equipment (valves, feed pipes, etc.) appear to be in good physical condition?	/___/	/___/
If not, give explanation of condition(s): _____		
Is there oil or petroleum products being stored in locations which are not referred to in the facility's contingency plan?	/___/	/___/
If yes, give oil type(s), quantity(s), and location(s): _____		
Is the tank(s) diked, enclosed by other impervious barrier, or located in an area from which drainage would not reach the receiving stream or municipal storm or sanitary sewers?	/___/	/___/
Give the probable drainage route (from source to end point) of spilled oil from this location: _____		
Do nearby drains, ditches, gutters, or sumps contain oil slicks?	/___/	/___/
If yes, give location(s): _____		

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Does the overall storage area(s) appear clean and free of oil? /__/ /__/

If not, explain: _____

_____

TRUCK, LOADING/UNLOADING, AND FUEL TRANSFER AREAS

Is there any evidence of oil leaks from oil tanker, or from pumps or piping? /__/ /__/

Does the overall loading/unloading area appear clean and free of oil? /__/ /__/

If not, explain: _____

_____

EQUIPMENT CHECK

Does facility have SPCCP equipment on-site and in locations specified in their SPCCP? /__/ /__/

If not, explain: _____

_____

Name of person conducting inspection: _____

Signature: _____ Date: _____

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APPENDIX II

POTOMAC ELECTRIC POWER COMPANY
PCB/OIL SPILL/LEAK REPORT

Date: _____ County: _____ State: _____

Time: _____ a.m. / p.m. City: _____ Facility: _____

Specific Location: _____

Amount: _____ _____

Type Oil: _____ _____

Was spill contained on land? _____ Explain: _____

_____

Did oil enter waterway? _____ Explain: _____

Specify PCB concentration: _____ _____

How did spill occur? _____

_____

_____

Was there a fire? _____ If yes, explain: _____

_____

State cleanup measures applied: _____

_____

_____

What is anticipated cleanup time? _____

Additional information: _____

_____

Name of person reporting spill: _____

Signature: _____ Date: _____

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APPENDIX III

HAZARDOUS WASTE MANIFEST

Department of Health and Mental Hygiene
Office of Environmental Programs
Waste Management Administration • Hazardous Waste Division
P.O. Box 13877 • Baltimore, Maryland 21203

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No | 2. Page 1 of | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

A. State Manifest Document Number: MDC 0046901

4. Generator's Phone ( )

B. State Generator's ID

5. Transporter 1 Company Name | 6. US EPA ID Number

C. State Transporter's ID: HWH | DC

7. Transporter 2 Company Name | 8. US EPA ID Number

D. Transporter's Phone

9. Designated Facility Name and Site Address | 10. US EPA ID Number

E. State Transporter's ID: HWH | DC

F. Transporter's Phone

G. State Facility ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.					
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.				
b.				
c.				
d.				

K. Handling Codes for Wastes Listed Above

a. | b. | c. | d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Maryland statutes or regulations.

Printed/Typed Name | Signature | Date (Month Day Year)

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Date (Month Day Year)

EPA Form 8700-22 (7-84)

FACILITY: DETACH & RETURN THIS COPY TO DISPOSAL STATE

GENERATOR

In case of an emergency or spill, immediately call the National Response Center at (800) 424-8802 and the Maryland OEP at (301) 383-6650 nights, and Holidays at (301) 243-8700

MDC 0046901